

RECEIVED

FEB 18 2004

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

Federal Communications Commission
Office of the Secretary

In the Matter of)	
)	
2002 Biennial Regulatory Review – Review)	
of the Commission's Broadcast Ownership)	
Rules and Other Rules Adopted Pursuant)	MB Docket 02-277
To Section 202 of the Telecommunications)	
Act of 1996)	
)	
Cross-Ownership of Broadcast Stations and)	
Newspapers)	MM Docket 01-235
)	
Rules and Policies Concerning Multiple)	
Ownership of Radio Broadcast Stations in)	MM Docket 01-317
Local Markets)	
)	
Definition of Radio Markets)	MM Docket 00-244
)	
Definition of Radio Markets for Areas)	
Not Located in an Arbitron Survey Area)	✓ MB Docket 03-130

PETITION FOR RECONSIDERATION

**CAPITOL BROADCASTING
COMPANY, INC.**

Dianne Smith
Special Projects Counsel
Capitol Broadcasting Company, Inc.
2619 Western Boulevard
Raleigh, NC 27606

September 4, 2003

SUMMARY

Capitol Broadcasting Company, Inc. ("CBC") hereby requests that the Federal Communications Commission (the "Commission") reconsider and reverse its decisions to retain the UHF discount loophole and to ignore duopolies and triopolies when calculating the national television ownership percentage (the "National Cap"). CBC also requests that the Commission immediately begin a comprehensive analysis of the impact of the new rules promulgated in this proceeding to determine if collectively they are consistent with the public interest and will ensure the Commission's core values of localism, diversity and competition, particularly viewpoint diversity, a paramount objective of this Commission. If, upon review, the Commission, with input from the public, finds that the new rules are inconsistent with the public interest, the Commission should reverse and revise the rules accordingly.

The UHF loophole should be eliminated for four reasons: 1) The Commission failed to adequately consider the UHF discount and, therefore, wrongly determined that it remains necessary in the public interest; 2) The Commission's treatment of the UHF discount undermines its own commitment to regulatory certainty; 3) The Commission ignores changes in the modern media marketplace in order to retain the UHF discount, while, at the same time, relying on those changes to justify other rule changes; and 4) The Commission's inconsistent treatment of UHF stations across its various media ownership rules defies its own goal of consistency in its rules.

The Commission should count duopolies and triopolies when calculating the national TV ownership percentage to avoid concentrating too much *potential* political power in the hands of a single media outlet at the national, state and local level. The Commission has emphatically stated that media outlets possess significant *potential* power in our system of government and in their ability to influence public opinion, but the interplay between the Commission's expanded

local and national TV ownership rules allows a single company the *potential* to exert an inordinate effect on public opinion and to possess significant power in our system of government on all levels. Through its ownership of local television stations, a single company could influence the outcome of the election of 98 U.S. Senators, 382 members of the U.S. House of Representatives, 49 governors, and 49 state legislatures, as well as countless local races. This result is inconsistent with the Commission's own sound policy objective limiting the *potential* power of a single media company.

Although the Commission reviewed its new media ownership rules individually, with guidance from its Diversity Index, there is no indication that the Commission analyzed the collective impact of the new rules on the public interest and the Commission's core values of localism, diversity and competition, particularly viewpoint diversity, a paramount objective of this Commission. The Commission should conduct a comprehensive analysis of the impact of its new rules and determine if collectively the result will be harmful to the public interest and viewpoint diversity. If the Commission does find that the new rules collectively will not achieve their public interest purpose, the Commission should reconsider its prior action and make changes as may be necessary. As the Commission's chairman stated during his August 20, 2003 press conference, "any day is a good day to be doing something for the public."

TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	THE COMMISSION SHOULD RECONSIDER AND REVERSE ITS DECISION TO RETAIN TWO HARMFUL LOOPHOLES WITHIN THE NATIONAL TV OWNERSHIP RULE	3
	A. The UHF Discount is Harmful to the Public Interest and is Inconsistent with the Commission's Congressional Mandate, the Commission's Goal of Regulatory Certainty, the Modern Media Marketplace, and the Commission's Other Media Ownership Rules and Should Be Eliminated	3
	B. Duopolies and Triopolies Should Be Counted When Calculating the National TV Ownership Percentage to Reduce the <i>Potential</i> Power of a Single Media Company	10
III.	THE COMMISSION SHOULD UNDERTAKE A COMPREHENSIVE REVIEW OF THE COLLECTIVE IMPACT OF THE NEW RULES TO DETERMINE IF THE RESULT PROMOTES THE PUBLIC INTEREST. IF NOT, THE COMMISSION SHOULD RECONSIDER AND REVISE ITS RULES ACCORDINGLY, WITH INPUT FROM THE PUBLIC.....	12
IV.	CONCLUSION	13
	APPENDIX A	15

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
2002 Biennial Regulatory Review – Review)	
of the Commission’s Broadcast Ownership)	
Rules and Other Rules Adopted Pursuant)	MB Docket 02-277
To Section 202 of the Telecommunications)	
Act of 1996)	
)	
Cross-Ownership of Broadcast Stations and)	
Newspapers)	MM Docket 01-235
)	
Rules and Policies Concerning Multiple)	
Ownership of Radio Broadcast Stations in)	MM Docket 01-317
Local Markets)	
)	
Definition of Radio Markets)	MM Docket 00-244
)	
Definition of Radio Markets for Areas)	
Not Located in an Arbitron Survey Area)	MB Docket 03-130

To the Commission:

PETITION FOR RECONSIDERATION

I. INTRODUCTION

Capitol Broadcasting Company, Inc. (“CBC”),¹ pursuant to Section 1.106 of the Federal Communications Commission’s (the “Commission”) rules, 47 C.F.R. § 1.106, hereby petitions the Commission to reconsider and reverse certain rules adopted in the *Report and Order*

¹ CBC is the licensee of WRAL-TV, WRAL-DT, WRAZ-TV, WRAZ-DT and WRAL-FM, Raleigh-Durham, North Carolina; WJZY-TV and WJZY-DT, Belmont, North Carolina; WWWB-TV and WWWB-DT, Rock Hill, South Carolina; and WILM-LPTV, Wilmington, North Carolina.

("Order") in the above-captioned proceedings.² As the licensee of four full-power analog television stations, four digital television stations, one low-power television station, and one radio station, CBC has been active in this proceeding meeting with Commissioners, staff personnel and submitting *ex parte* filings.³ CBC's Petition for Reconsideration relies on facts presented in the Order, the Commission's analysis of those facts, and the specifics of the resulting new rules – all of which were unavailable prior to the release of the Order on July 2, 2003.⁴ CBC seeks reconsideration of the following aspects of the Order:

- The Commission should reverse its position and remove two harmful loopholes within the national TV ownership rule (the "National Cap") – the UHF discount and the failure to account for duopolies and triopolies when calculating the national television ownership percentage.

- The Commission should review the collective impact of the new rules on a national, state and local level to determine if the results of that review are consistent with the public interest and the Commission's core values of localism, diversity and competition, particularly viewpoint diversity, "a paramount objective of this Commission."⁵ If the Commission finds that the collective impact of the new rules is inconsistent with the public interest, it should reconsider and revise its rules accordingly. The public must have an opportunity to review and comment on the Commission's analysis.

² FCC 03-127, adopted June 2, 2003 and released July 2, 2003 ("Order").

³ 47 C.F.R. § 1.106(b)(1).

⁴ 47 C.F.R. §§ 1.106(b)(2), 1.106(c).

⁵ Order at ¶ 32.

("Order") in the above-captioned proceedings.² As the licensee of four full-power analog television stations, four digital television stations, one low-power television station, and one radio station, CBC has been active in this proceeding meeting with Commissioners, staff personnel and submitting *ex parte* filings.³ CBC's Petition for Reconsideration relies on facts presented in the Order, the Commission's analysis of those facts, and the specifics of the resulting new rules – all of which were unavailable prior to the release of the Order on July 2, 2003.⁴ CBC seeks reconsideration of the following aspects of the Order:

- The Commission should reverse its position and remove two harmful loopholes within the national TV ownership rule (the "National Cap") – the UHF discount and the failure to account for duopolies and triopolies when calculating the national television ownership percentage.
- The Commission should review the collective impact of the new rules on a national, state and local level to determine if the results of that review are consistent with the public interest and the Commission's core values of localism, diversity and competition, particularly viewpoint diversity, "a paramount objective of this Commission."⁵ If the Commission finds that the collective impact of the new rules is inconsistent with the public interest, it should reconsider and revise its rules accordingly. The public must have an opportunity to review and comment on the Commission's analysis.

² FCC 03-127, adopted June 2, 2003 and released July 2, 2003 ("Order").

³ 47 C.F.R. § 1.106(b)(1).

⁴ 47 C.F.R. §§ 1.106(b)(2), 1.106(c).

⁵ Order at ¶ 32.

II. THE COMMISSION SHOULD RECONSIDER AND REVERSE ITS DECISION TO RETAIN TWO HARMFUL LOOPHOLES WITHIN THE NATIONAL TV OWNERSHIP RULE

A. The UHF Discount is Harmful to the Public Interest and is Inconsistent with the Commission's Congressional Mandate, the Commission's Goal of Regulatory Certainty, the Modern Media Marketplace, and the Commission's Other Media Ownership Rules and Should Be Eliminated

The effect of the UHF loophole is to change the national TV ownership rule to permit a single company to own television stations that reach 90% of the television households in the United States ("U.S.") rather than 45%. The UHF discount, which attributes only 50% of the television households in a Designated Market Area ("DMA") to an entity's national ownership percentage, is no longer in the public interest. Moreover, it is inconsistent with the Commission's Congressional mandate, the Commission's goal of regulatory certainty, the modern media marketplace, and the Commission's other media ownership rules. The UHF discount no longer has any relevance and should be eliminated immediately. A loophole that **doubles** the National Cap as set by the Commission requires additional consideration from the Commission for the following reasons:

- 1) The Commission failed to adequately consider the UHF discount and, thus, wrongly determined that the UHF discount remains necessary in the public interest. The Order addresses this harmful loophole only briefly. In the post-adoption editing process, the Commission added some notations "to respond to weaknesses in reasoning and outcomes identified by the dissents" and the addition of "discussions further justifying . . . the disparate treatment of UHF stations in our local and national ownership rules" according to Commissioner Kevin J. Martin in his statement

accompanying the Order.⁶ The Commission's failure to adequately consider the loophole's consequences, intended or unintended, justifies reconsideration. As a result, CBC petitions the Commission to further examine whether the UHF discount is consistent with the Commission's mandate in Section 202(h) of the Telecommunications Act of 1996 to determine if its ownership rules are necessary in the public interest and to repeal or modify any that are not.

- 2) The Commission's treatment of the UHF discount undermines its own commitment to regulatory certainty. Although the Order purports to put an end to market uncertainty,⁷ the National Cap remains in limbo with the Commission's action and inaction regarding the UHF discount. While the Commission acknowledges that the digital transition will eliminate the technical basis for the UHF discount,⁸ it fails to provide clear rules to address this pending marketplace change. The Commission retained the UHF discount for now;⁹ sunset the discount for stations owned by ABC, CBS, FOX and NBC "as the digital transition is completed on a market by market

⁶ Statement of Commissioner Kevin J. Martin with Order, fn. 29.

⁷ See Order at ¶ 5 ("Inaction on our part and the market uncertainty that would result from a perpetuation of the open-ended policy limbo that exists today would ill serve our nation. The adoption of this *Order* is critical, therefore, to the realization of our public interest goals in that it puts an end to any uncertainty regarding the scope and effect of our structural broadcast ownership rules.").

⁸ Order at ¶ 591 ("At this point, however, it is clear that the digital transition will largely eliminate the technical basis for the UHF discount because UHF and VHF signals will be substantially equalized.").

⁹ Order at ¶ 500.

basis” unless the Commission decides to continue it;¹⁰ and postponed a decision on whether to sunset the discount for other station owners until a subsequent biennial review.¹¹ When is the digital transition complete on a market-by-market basis? How does an owner come into compliance when the loophole sunsets – divestiture or grandfathering? Will stations acquired after the Order with notice of the sunset provision be treated differently than those acquired prior to the Order? Why provide a sunset provision that just affects the ABC, CBS, FOX and NBC owned stations when the digital transition will affect all stations and all owners? Which subsequent biennial review? The Commission states “[B]ased on the record and our own experience administering structural ownership rules, we conclude that the adoption of bright line rules, on balance, continues to play a valuable role in implementing the Commission’s goals.”¹² There are no UHF bright line rules related to the digital transition. There is no market certainty. There are only questions.

- 3) The Commission ignores changes in the modern media marketplace related to UHF stations and fails to consider any of the data submitted by CBC in its May 29, 2003 *ex parte* filing.¹³ First, during the Order’s 20 pages devoted to the modern media

¹⁰ See Order at ¶ 591 (“This sunset will apply unless, prior to that time, the Commission makes an affirmative determination that the public interest would be served by continuation of the discount beyond the digital transition.”)

¹¹ *Id.*

¹² Order at ¶ 80.

¹³ *Ex parte* letter, Capitol Broadcasting Company, Inc., MB Docket 02-277 (filed May 30, 2003) (“CBC 5/29/03 *ex parte* letter”)

marketplace,¹⁴ the Commission never mentions advances that have equalized UHF and VHF stations and later minimizes them in its National Cap discussion. While the Commission predicates most of the new ownership rules on changes in the modern media marketplace, the Commission ignores those changes related to the UHF discount, including trivializing mandatory cable (and satellite) carriage, disregarding the Commission's own rules that allow UHF stations greater operating power limits, and elevating the importance of non-comparable ratings.¹⁵ Today's modern media marketplace actually shows the following:

- a. Must carry and carry one/carry all, in concert with today's multichannel video reach of 85% of TV households, have equalized the playing field between UHF and VHF stations.
- b. Utilizing maximum power levels established by the Commission, UHF's and VHF's can now achieve almost equivalent coverage areas, negating the original intent of the UHF discount.¹⁶

¹⁴ Order at ¶¶ 86-128.

¹⁵ Order at ¶¶ 585-588.

¹⁶ CBC 5/29/03 *ex parte* letter ("First, we offer a side-by-side comparison of CBC's two analog stations located in Raleigh, North Carolina -- a VHF, WRAL-TV Channel 5 (CBS -- 100KW), and a UHF, WRAZ-TV Channel 50 (FOX -- 5 million watts located 230 feet below WRAL-TV on the same tower). Utilizing maximum power levels allowed by the Commission, we achieve almost equivalent coverage. According to a comparison prepared by Cohen, Dippell and Everist, P.C. in May 2003, there is less than a 6% difference between our VHF and UHF signals based on the actual interference-free population reached within the Grade B service areas according to Longley-Rice. Our VHF station reaches approximately 1.8 million people, while our UHF reaches approximately 1.7 million. Therefore, the difference in off-air reach between the VHF and UHF signals is less than 6% -- not 50% as implied by the current rule.")

- c. Although CBC questions the appropriateness of ratings as a justification for the UHF loophole, CBC offers the following comparison of FOX UHF and VHF affiliates in the top 50 markets.

Top 50 TV Markets¹⁷
FOX Affiliates Prime-Time Ratings/Shares

Top 50 Markets	DMA Homes Rating	DMA Homes Share	Persons 18-49 Rating	Persons 25-54 Rating
VHF FOX Affiliates (25 VHF stations)	8.9 (8.6% greater than UHF)	13.0 (8.2% greater than UHF)	7.4 (4.2% greater than UHF)	7.3 (5.8% greater than UHF)
UHF FOX Affiliates (24 UHF stations)	7.5	11.0	6.8	6.5

A.C. Nielsen Reported Ratings February 2003¹⁸

The difference between a VHF and UHF FOX affiliate based on ratings ranges from 4.2% to 8.6%, not 50%. Any discount should be relevant to the current marketplace. According to most brokers, station values today are based upon cash flow (which results from ratings and, in turn, advertising sales) and network affiliations, not whether it is a UHF or a VHF facility – making the FOX empirical data more credible than comparing ratings and values of the less established networks, which also have a lot of UHF affiliates. The value of the latter stations is based upon lack of ratings and programming offered by a less popular network. In addition, as stated above, the Commission fails to establish clear rules to deal with the digital transition, when according to the Commission's own Digital Table of Allotments, 94%

¹⁷ This is actually 49 of the top 50 markets with Boston not reporting.

¹⁸ CBC 5/29/03 *ex parte* letter.

of all stations will be UHF, representing a significant modern media marketplace change. Finally, the Commission's justification for the UHF discount based upon its desire to promote new networks is a laudable goal, although perhaps unrealistic based upon today's marketplace. With the pending digital transition and with the expanded local TV rule concentrating stations in the hands of current owners, it is unlikely any new network will launch.

- 4) The Commission's inconsistent treatment of UHF stations across its various media ownership rules defies its own goal of consistency to comply with directives from the U.S. Court of Appeals for the District of Columbia Circuit. The national TV ownership rule is the Commission's only ownership rule that makes a distinction between UHF and VHF television stations for counting purposes. Both the local TV ownership rule and the cross-media rule count UHF and VHF stations the same. Apparently, as previously discussed, according to Commissioner Martin, the Commission's response to the UHF inconsistency between the local and national rules was done post-adoption editing. It is a baffling comparison between the Commission's top four-station restriction in the local rule to the UHF loophole in the national rule.¹⁹ The Commission also notes

¹⁹ Order at fn. 411 ("The local television ownership rule is consistent with a key aspect of our national television ownership rule in recognizing competitive disparities among stations. Our national television ownership cap recognizes competitive disparities between stations through use of the UHF discount, while our local television ownership cap recognizes competitive disparities between stations by prohibiting mergers of the top four-ranked stations in a market. The national ownership rule is an audience reach limitation, so it makes sense to adjust that limitation based on the diminished coverage of UHF stations. The local ownership rule, on the other hand, places a limitation on the number of stations that one entity may own in a market. Thus, that rule limits mergers of the top four-ranked stations in a market. Furthermore, in the

that in the local rule it will take account of a station's UHF status in considering waiver requests. If it will consider waiver requests on a case-by-case basis in the local rule, should there not be a comparable opportunity in the national rule? Should all UHF stations automatically represent a 50% discount? For consistency purposes, should the Commission also look at UHF stations in the national ownership rule on a case-by-case basis? The Commission's own Diversity Index, which serves as the basis for its cross-media limits, treats UHF and VHF stations the same, noting that "our signal carriage rules more or less equalize the coverage of all television stations in a particular DMA."²⁰ "The underlying assumption here is that all outlets have at least similar technical characteristics."²¹ Further, although when justifying the UHF loophole in the National Cap, the Commission takes into account the actual coverage of the television signal, it takes a different position in the local radio rule, stating "[B]ut radio stations serve people, not land."²²

In summary, the Commission should reverse its decision to retain the UHF discount in the national TV ownership rule because it is no longer necessary in the public interest and is

local television ownership rule, we take account of a station's UHF status in considering certain waiver requests, as discussed further below. Finally, we note that the top-four merger restriction in our local television ownership rule and the UHF discount in our national television ownership rule, while analogous, are not identical and do not serve exactly the same purpose. The UHF discount is premised, in part, on promoting the development of new and emerging networks. This rationale does not apply in the local television ownership context because ownership of multiple stations in a market does not promote development of new networks. The top-four limitation in the local television ownership rule, in contrast, is premised on competition theory, which is not the basis for the national television ownership rule.").

²⁰ Order at ¶ 421.

²¹ Id.

inconsistent with the Commission's Congressional mandate, the Commission's goal of regulatory certainty, the modern media marketplace, and the Commission's other media ownership rules. In the alternative, the Commission should sunset the UHF discount with the digital transition and provide specific rules and timetables for companies to comply with the National Cap minus the UHF discount. If not, the UHF discount will gut localism and diversity, making the National Cap meaningless and contrary to the purpose of the Order.

B. Duopolies and Triopolies Should Be Counted When Calculating the National TV Ownership Percentage to Reduce the *Potential* Power of a Single Media Company

By ignoring the interplay between the local and national TV ownership rules, the Commission violates its own stated public policy of concentrating too much *potential* power in the hands of a single media outlet. The Order notes the following:

Further, owners of media outlets clearly have the ability to affect public discourse, including political and governmental affairs, through their coverage of news and public affairs. Even if our inquiry were to find that media outlets exhibited no apparent "slant" or viewpoint in their news coverage, media outlets possess significant *potential* power in our system of government. We believe sound public policy requires us to assume that power is being, or could be, exercised.²³

The record contains evidence that reporters and other employees of broadcasting companies alter their news coverage to suit their companies' interests. This suggests that whatever financial interest that media companies may have in presenting unbiased news coverage, those incentives are not the only factors that explain news coverage decisions.²⁴

As we have explained, "the greater the diversity of ownership in a particular area, the less chance there is that a single person or group can have an inordinate effect, in a political, editorial, or similar programming sense, on public opinion at

²² Order at ¶ 273.

²³ Order at ¶ 28.

²⁴ Order at ¶ 29.

the regional level.”²⁵

CBC’s analysis of the Order finds that a single company can exert tremendous influence on the political process at the national, state and local levels as a result of the new national TV cap, the UHF loophole, and the expanded local TV ownership rule – resulting in a single company having an inordinate effect on public opinion and significant power in our system of government. Through its ownership of local television stations, a single company could influence the outcome of the election of 98 U.S. Senators, 382 members of the U.S. House of Representatives, 49 governors, and 49 state legislatures, as well as countless local races.²⁶ Based on CBC’s analysis, a single company could own television stations under the following scenarios:²⁷

- At least one television station in every market in every state except California (199 of 210 TV markets). In 139 of the markets, the company could own two stations, and in 4 markets, the company could own three stations.
- At least one VHF station in every TV market in 40 states or in the nation’s six most populous states (California, New York, Texas, Florida, Pennsylvania and Ohio).
- Up to 48 stations in 21 TV markets (at least one VHF in markets 1 through 21).
- Up to 310 stations in 177 TV markets (at least one VHF in markets 23 through 210) - 23.05% of all full-power commercial TV stations.
- Up to 237 UHF stations in 117 markets (markets 1 through 117) - 17.62% of all full-power commercial TV stations.
- Up to 369 UHF stations in 208 TV markets (all except New York and Los Angeles) - 27.43% of all full-power commercial TV stations.
- Or a company could focus its strategy on a selected state, a region or a collection of states for whatever reason. For example, under the new rules a single company could own 32

²⁵ Order at ¶ 38.

²⁶ Note that the same single company could also own newspapers, radio stations, cable companies, national cable channels, Internet sites and magazines, but for this purpose, CBC simply addresses the number and locale of local television stations.

²⁷ See Appendix A.

TV stations in Texas, 24 in California, 15 in New York, 13 in Michigan, 11 in Tennessee, and 11 in North Carolina.

To accomplish its sound policy objective of limiting the *potential* power of a single media company and the Commission's assumption that power is being, or could be, exercised, the Commission should reconsider the power resulting between the interplay of the new national TV ownership cap at 45%, the UHF loophole giving the National Cap a 90% effect, and the local TV rule expanding duopolies and adding triopolies. Part of this reconsideration should be to include duopolies and triopolies in the national TV ownership cap calculation.

III. THE COMMISSION SHOULD UNDERTAKE A COMPREHENSIVE REVIEW OF THE COLLECTIVE IMPACT OF THE NEW RULES TO DETERMINE IF THE RESULT PROMOTES THE PUBLIC INTEREST. IF NOT, THE COMMISSION SHOULD RECONSIDER AND REVISE ITS RULES ACCORDINGLY, WITH INPUT FROM THE PUBLIC.

The Commission should review the collective impact of the new rules on a national, state and local level to determine if the results of that review are consistent with the public interest and its core values of localism, diversity and competition. If not, the Commission should reconsider and revise its rules accordingly. Although the Commission analyzes each rule individually and gleans cursory guidance from its Diversity Index, the Commission fails to provide a thorough analysis of the impact of all the rules on what a single company can own. Examples of the interplay between the national and local TV ownership rules are addressed above. Further empirical data is provided in Appendix A on a market-by-market, state and national basis.

The impact of the collective rules is of particular concern to viewpoint diversity. "It has long been a tenet of national communications policy that the widest possible dissemination of

information from diverse and antagonistic sources is essential to the public welfare.”²⁸ The Commission notes this policy is given effect through the regulation of broadcast ownership.²⁹ The Commission further states “[V]iewpoint diversity is a paramount objective of this Commission because the free flow of ideas under-girds and sustains our system of government”³⁰ and “[W]e adhere to our longstanding determination that the policy of limiting common ownership of media outlets is the most reliable means of promoting viewpoint diversity. Nothing in this record causes us to reconsider this conclusion.”³¹ If viewpoint diversity truly is the paramount objective of this Commission, then it should begin an immediate thorough analysis of what a single company can own based on the interplay of all the rules and reconsider rules to achieve that objective, with input from the public.

IV. CONCLUSION

For the foregoing reasons, CBC respectfully requests that the Commission reconsider and reverse the Order to the extent that it retains the UHF loophole and that it does not include duopolies and triopolies in calculating the ownership percentage in the national TV ownership rule. Further, the Commission should undertake an extensive analysis of the impact of the collective rules on what a single media company can actually own to determine if it is in the public interest and consistent with the Commission’s paramount objective of preserving

²⁸ *Turner I*, 512 U.S. at 663-64 (internal quotation marks omitted) (quoting *United States v. Midwest Video Corp.*, 406 U.S. 649, 668 n.27 (1972) (plurality opinion) (quoting *Associated Press v. United States*, 326 U.S. 1, 20 (1945))).

²⁹ Order at ¶ 19.

³⁰ Order at ¶ 32.

³¹ Order at ¶ 26.

viewpoint diversity. If not, the Commission should reconsider and revise the rules accordingly, giving the public an opportunity to review the Commission's analysis and comment.

Respectfully submitted,

CAPITOL BROADCASTING COMPANY, INC.

By: /s/ Dianne Smith

Dianne Smith

Special Projects Counsel

2619 Western Boulevard

Raleigh, NC 27606

Telephone: (919) 821-8933

Cellphone: (919) 418-8529

Facsimile: (919) 821-8733

September 4, 2003

Appendix A
CBC Petition for Reconsideration

Comprehensive TV Market Summary

RANK	DMA	STATE	TVHH	% of US	Cum % US inc	Cum % US dec	Tot Stat	Sat Stat	sat VHF	sat UHF	Total w/o sat	w/o sat VHF	w/o sat UHF	Comm Stat	ED Stat	Comm VHF	Comm UHF	ED VHF	ED UHF
1	New York	NY	7,282,320	6.829	6.829	100.000	23	2	0	2	21	7	14	16	5	6	10	1	4
2	Los Angeles	CA	5,318,040	4.987	11.816	93.171	25	0	0	0	25	6	19	21	4	6	15	0	4
3	Chicago	IL	3,351,330	3.143	14.959	88.184	16	0	0	0	16	5	11	14	2	5	9	0	2
4	Philadelphia	PA	2,830,470	2.654	17.613	85.041	20	1	0	1	19	4	15	15	4	3	12	1	3
5	San Francisco-Oak-San Jose	CA	2,436,220	2.284	19.897	82.387	23	1	1	0	22	6	16	17	5	5	12	1	4
6	Boston (Manchester)	MA	2,353,500	2.207	22.104	80.103	21	2	0	2	19	6	13	15	4	4	11	2	2
7	Dallas-Ft. Worth	TX	2,195,540	2.059	24.163	77.896	18	0	0	0	18	6	12	16	2	4	12	2	0
8	Washington, DC (Hagrstwn)	DC	2,169,230	2.034	26.197	75.837	18	3	0	3	15	4	11	11	4	4	7	0	4
9	Atlanta	GA	1,971,180	1.848	28.045	73.803	13	0	0	0	13	4	9	11	2	3	8	1	1
10	Detroit	MI	1,899,910	1.782	29.827	71.955	9	0	0	0	9	3	6	8	1	3	5	0	1
11	Houston	TX	1,814,140	1.701	31.528	70.173	17	0	0	0	17	4	13	16	1	3	13	1	0
12	Seattle-Tacoma	WA	1,659,100	1.556	33.084	68.472	17	1	0	1	16	7	9	14	2	6	8	1	1
13	Tampa-St. Pete (Sarasota)	FL	1,620,110	1.519	34.603	66.916	14	0	0	0	14	4	10	12	2	3	9	1	1
14	Minneapolis-St. Paul	MN	1,594,740	1.495	36.098	65.397	19	6	2	4	13	7	6	8	5	4	4	3	2
15	Cleveland-Akron (Canton)	OH	1,528,840	1.434	37.532	63.902	14	0	0	0	14	3	11	12	2	3	9	0	2
16	Phoenix	AZ	1,524,130	1.429	38.961	62.468	16	1	1	0	15	8	7	14	1	7	7	1	0
17	Miami-Ft. Lauderdale	FL	1,486,860	1.394	40.355	61.039	15	0	0	0	15	6	9	13	2	5	8	1	1
18	Denver	CO	1,366,250	1.281	41.636	59.645	16	2	0	2	14	7	7	12	2	5	7	2	0
19	Sacramnto-Stktn-Modesto	CA	1,227,600	1.151	42.787	58.364	11	0	0	0	11	4	7	10	1	3	7	1	0
20	Orlando-Daytona Bch-Melbrn	FL	1,224,470	1.148	43.935	57.213	16	0	0	0	16	3	13	13	3	3	10	0	3
21	Pittsburgh	PA	1,165,660	1.093	45.028	56.065	10	0	0	0	10	4	6	7	3	3	4	1	2
22	St. Louis	MO	1,156,370	1.084	46.112	54.972	9	0	0	0	9	6	3	8	1	5	3	1	0
23	Portland, OR	OR	1,061,080	0.995	47.107	53.888	11	0	0	0	11	6	5	9	2	4	5	2	0
24	Baltimore	MD	1,060,450	0.994	48.101	52.893	8	1	0	1	7	3	4	5	2	3	2	0	2
25	Indianapolis	IN	1,019,870	0.956	49.057	51.899	14	1	0	1	13	4	9	10	3	4	6	0	3
26	San Diego	CA	1,004,220	0.942	49.999	50.943	7	0	0	0	7	2	5	6	1	2	4	0	1
27	Hartford & New Haven	CT	980,410	0.919	50.918	50.001	10	1	0	1	9	2	7	8	1	2	6	0	1
28	Charlotte	NC	962,540	0.903	51.821	49.082	12	0	0	0	12	2	10	8	4	2	6	0	4
29	Raleigh-Durham (Fayetteville)	NC	929,460	0.872	52.693	48.179	13	1	0	1	12	3	9	9	3	2	7	1	2
30	Nashville	TN	880,670	0.826	53.519	47.307	12	0	0	0	12	4	8	10	2	3	7	1	1
31	Milwaukee	WI	860,350	0.807	54.326	46.481	12	0	0	0	12	4	8	10	2	3	7	1	1
32	Cincinnati	OH	854,250	0.801	55.127	45.674	9	0	0	0	9	3	6	5	4	3	2	0	4
33	Kansas City	MO	852,510	0.799	55.926	44.873	9	0	0	0	9	3	6	8	1	3	5	0	1
34	Columbus, OH	OH	835,780	0.784	56.710	44.074	7	0	0	0	7	3	4	6	1	3	3	0	1
35	Greenville-Spart-Ashevil-And	NC	792,110	0.743	57.453	43.290	12	1	0	1	11	3	8	8	3	3	5	0	3
36	Salt Lake City	UT	769,230	0.721	58.174	42.547	18	1	1	0	17	11	6	13	4	8	5	3	1
37	San Antonio	TX	718,730	0.674	58.848	41.826	13	0	0	0	13	6	8	12	1	5	7	1	0
38	Grand Rapids-Kalmazoo-B.Crk	MI	713,800	0.669	59.517	41.152	10	1	0	1	9	3	6	8	1	3	5	0	1
39	West Palm Beach-Ft. Pierce	FL	700,850	0.657	60.174	40.483	10	0	0	0	10	2	8	9	1	2	7	0	1
40	Birmingham (Ann and Tusc)	AL	690,030	0.647	60.821	39.826	13	3	0	3	10	4	6	8	2	2	6	2	0
41	Norfolk-Portsmouth-Newpt Nws	VA	677,610	0.635	61.456	39.179	9	0	0	0	9	4	5	8	1	4	4	0	1
42	New Orleans	LA	658,830	0.618	62.074	38.544	10	0	0	0	10	4	6	8	2	3	5	1	1
43	Memphis	TN	653,840	0.613	62.687	37.926	9	0	0	0	9	4	5	7	2	3	4	1	1
44	Buffalo	NY	639,190	0.599	63.286	37.313	10	0	0	0	10	3	7	9	1	3	6	0	1
45	Oklahoma City	OK	636,970	0.597	63.883	36.714	12	1	1	0	11	4	7	10	1	3	7	1	0

Comprehensive TV Market Summary

RANK	DMA	STATE	TVHH	% of US	Cum % US inc	Cum % US dec	Tot Stat	Sat Stat	sat VHF	sat UHF	Total w/o sat	w/o sat VHF	w/o sat UHF	Comm Stat	ED Stat	Comm VHF	Comm UHF	ED VHF	ED UHF
46	Greensboro-H. Point-W. Salem	NC	634,140	0.595	64,478	36,117	9	0	0	0	9	3	6	8	1	3	5	0	1
47	Harrisburg-Lncstr-Leb-York	PA	626,660	0.588	65,066	35,522	7	0	0	0	7	1	6	6	1	1	5	0	1
48	Providence-New Bedford	RI	624,020	0.585	65,651	34,934	8	0	0	0	8	3	5	6	2	3	3	0	2
49	Albuquerque-Santa Fe	NM	620,230	0.582	66,233	34,349	24	8	7	1	16	7	9	14	2	5	9	2	0
50	Louisville	KY	612,300	0.574	66,807	33,767	10	0	0	0	10	2	8	7	3	0	7	2	1
51	Jacksonville, Brunswick	FL	587,200	0.551	67,358	33,193	10	0	0	0	10	4	6	8	2	2	6	2	0
52	Las Vegas	NV	585,440	0.549	67,907	32,642	10	0	0	0	10	6	4	9	1	5	4	1	0
53	Wilkes Barre-Scranton	PA	580,290	0.544	68,451	32,093	9	1	0	1	8	0	8	7	1	0	7	0	1
54	Austin	TX	552,060	0.518	68,969	31,549	8	1	0	1	7	1	6	6	1	1	5	0	1
55	Albany-Schenectady-Troy	NY	532,520	0.499	69,468	31,031	8	1	0	1	7	3	4	6	1	3	3	0	1
56	Little Rock-Pine Bluff	AR	523,810	0.491	69,959	30,532	14	2	2	0	12	4	8	11	1	3	8	1	0
57	Fresno-Visalia	CA	519,330	0.487	70,446	30,041	13	1	0	1	12	0	12	11	1	0	11	0	1
58	Dayton	OH	506,240	0.475	70,921	29,554	7	0	0	0	7	2	5	6	1	2	4	0	1
59	Richmond-Petersburg	VA	505,370	0.474	71,395	29,079	7	0	0	0	7	3	4	5	2	3	2	0	2
60	Tulsa	OK	496,880	0.466	71,861	28,605	13	1	1	0	12	4	8	10	2	3	7	1	1
61	Charleston-Huntington	WV	495,320	0.464	72,325	28,139	12	0	0	0	12	4	8	7	5	4	3	0	5
62	Mobile-Pensacola (Ft Walt)	AL	490,590	0.460	72,785	27,675	13	0	0	0	13	3	10	11	2	3	8	0	2
63	Knoxville	TN	489,710	0.459	73,244	27,215	9	0	0	0	9	4	5	7	2	3	4	1	1
64	Flint-Saginaw-Bay City	MI	466,510	0.437	73,681	26,756	12	4	1	3	8	2	6	5	3	0	5	2	1
65	Lexington	KY	454,440	0.426	74,107	26,319	11	3	0	3	8	0	8	7	1	0	7	0	1
66	Wichita-Hutchinson Plus	KS	445,250	0.418	74,525	25,893	20	10	8	2	10	6	4	6	4	3	3	3	1
67	Roanoke-Lynchburg	VA	445,000	0.417	74,942	25,475	8	1	0	1	7	3	4	6	1	3	3	0	1
68	Toledo	OH	432,770	0.406	75,348	25,058	6	0	0	0	6	2	4	5	1	2	3	0	1
69	Green Bay-Appleton	WI	418,580	0.393	75,741	24,652	8	0	0	0	8	3	5	7	1	3	4	0	1
70	Ft. Myers-Naples	FL	413,730	0.388	76,129	24,259	7	0	0	0	7	1	6	6	1	1	5	0	1
71	Honolulu	HI	401,330	0.376	76,505	23,871	25	12	9	3	13	6	7	12	1	5	7	1	0
72	Des Moines-Ames	IA	400,830	0.376	76,881	23,495	8	0	0	0	8	4	4	6	2	3	3	1	1
73	Springfield, MO	MO	400,390	0.375	77,256	23,119	7	0	0	0	7	2	5	6	1	2	4	0	1
74	Tucson (Sierra Vista)	AZ	399,800	0.375	77,631	22,744	10	1	0	1	9	6	3	8	1	6	2	0	1
75	Paducah-C. Gird-Harbg-Mt VN	KY	395,190	0.371	78,002	22,369	10	1	0	1	9	4	5	6	3	3	3	1	2
76	Portland-Auburn	ME	391,930	0.368	78,370	21,998	8	0	0	0	8	4	4	6	2	3	3	1	1
77	Rochester, NY	NY	388,600	0.364	78,734	21,630	6	0	0	0	6	3	3	5	1	3	2	0	1
78	Omaha	NE	386,600	0.363	79,097	21,266	8	1	0	1	7	3	4	5	2	3	3	2	2
79	Spokane	WA	381,130	0.357	79,454	20,903	10	1	0	1	9	6	3	6	1	3	3	0	1
80	Syracuse	NY	375,880	0.352	79,806	20,546	7	0	0	0	7	3	4	6	1	3	3	3	0
81	Shreveport	LA	372,950	0.350	80,156	20,194	7	0	0	0	7	3	4	6	1	3	3	0	1
82	Champaign-Sprngfld-Decatur	IL	371,240	0.348	80,504	19,844	11	2	0	2	9	2	7	6	3	1	5	1	2
83	Huntsville-Decatur (Flor)	AL	359,260	0.337	80,841	19,496	8	0	0	0	8	0	8	6	2	0	6	0	2
84	Columbia, SC	SC	357,810	0.336	81,177	19,159	7	0	0	0	7	1	6	5	2	1	4	0	2
85	Chattanooga	TN	351,610	0.330	81,507	18,823	8	0	0	0	8	3	5	6	2	3	3	0	2
86	Madison	WI	348,590	0.327	81,834	18,493	6	0	0	0	6	1	5	5	1	1	4	0	1
87	South Bend-Elkhart	IN	326,470	0.306	82,140	18,166	5	0	0	0	5	0	5	5	1	0	4	0	1
88	Cedar Rapids-Wrlro-IWC&Dub	IA	323,810	0.304	82,444	17,860	9	2	0	2	7	4	3	5	2	3	2	1	1
89	Jackson, MS	MS	320,260	0.300	82,744	17,556	6	1	0	1	5	2	3	4	1	1	2	0	1
90	Tri-Cities, TN-VA	TN	318,390	0.299	83,043	17,256	7	0	0	0	7	2	5	5	2	2	3	0	2

Comprehensive TV Market Summary

RANK	DMA	STATE	Cum % US	Cum % of US	TVHH	ED	UHF	ED	UHF
91	Burlington-Plattsburgh	VT	317,700	0.298	83,341	16,957	11	4	3
92	Davenport-R.Island-Moline	IL	306,450	0.287	83,628	16,659	7	0	2
93	Waco-Temple-Bryan	TX	303,560	0.285	83,913	16,372	9	1	3
94	Colorado Springs-Pueblo	CO	302,750	0.284	84,197	16,087	5	0	0
95	Baton Rouge	LA	295,790	0.277	84,474	15,803	5	0	0
96	Johnstown-Alliouna	PA	294,750	0.276	84,750	15,526	6	0	1
97	Harlingen-Wsico-Brmvsl-MCA	TX	287,230	0.269	85,019	15,250	8	0	0
98	Savannah	GA	284,160	0.266	85,285	14,981	7	0	1
99	Evansville	IN	280,860	0.263	85,548	14,715	8	0	2
100	Youngstown	OH	277,760	0.260	85,808	14,452	4	0	1
101	El Paso	TX	276,330	0.259	86,067	14,192	10	0	1
102	Lincoln & Hstngs-Krny Plus	NE	266,890	0.250	86,317	13,933	13	7	1
103	Greenville-N.Bern-Washingtn	NC	266,390	0.250	86,567	13,683	10	2	2
104	Ft. Wayne	IN	264,140	0.248	86,815	13,433	6	0	0
105	Charleston, SC	SC	262,560	0.246	87,061	13,185	6	0	0
106	Springfield-Holyoke	MA	258,330	0.242	87,303	12,939	3	0	1
107	Tallahassee-Thomsville	FL	255,980	0.240	87,543	12,697	7	0	0
108	Ft. Smith-Fay-Sprngdl-Rgrs	AR	255,390	0.239	87,782	12,457	7	2	0
109	Tyler-Longview(Lfkn&Ncgd)	TX	254,780	0.239	88,021	12,218	5	2	0
110	Florence-Myrtle Beach	SC	253,630	0.238	88,259	11,979	6	1	1
111	Lansing	MI	248,250	0.233	88,492	11,741	6	0	0
112	Sioux Falls(Mitchell)	SD	244,310	0.229	88,721	11,508	18	11	1
113	Traverse City-Cadillac	MI	243,870	0.229	88,950	11,279	10	5	3
114	Reno	NV	241,660	0.227	89,177	11,050	8	0	0
115	Augusta	GA	240,710	0.226	89,403	10,823	6	0	0
116	Montgomery (Selma)	AL	240,290	0.225	89,628	10,597	12	2	1
117	Peoria-Bloomington	IL	236,810	0.222	89,850	10,372	6	0	0
118	Fargo-Valley City	ND	231,530	0.217	90,067	10,150	11	5	0
119	SanBarbra-SanMar-SanLuOb	CA	230,250	0.216	90,283	9,933	6	0	0
120	Monteary-Salinas	CA	228,290	0.214	90,497	9,717	5	0	0
121	Eugene	OR	223,630	0.210	90,707	9,503	12	6	2
122	Maccon	GA	221,300	0.208	90,915	9,293	6	0	0
123	La Crosse-Eau Claire	WI	217,930	0.204	91,119	9,085	7	2	0
124	Boise	ID	216,960	0.203	91,322	8,881	6	0	0
125	Lafayette, LA	LA	213,380	0.200	91,522	8,678	4	0	0
126	Columbus, Ga	GA	203,510	0.191	91,713	8,478	6	0	0
127	Yakima-Pasco-Rchind-Knnwck	WA	199,120	0.187	91,900	8,287	10	5	0
128	Corpus Christi	TX	191,280	0.179	92,079	8,100	5	0	0
129	Amarillo	TX	189,880	0.178	92,257	7,921	7	1	0
130	Bakersfield	CA	186,400	0.175	92,432	7,743	4	0	0
131	Columbus-Tupelo-West Point	MS	186,100	0.175	92,607	7,568	6	1	0
132	Chico-Redding	CA	184,280	0.173	92,780	7,393	5	0	0
133	Monroe-El Dorado	LA	177,700	0.167	92,947	7,220	6	0	0
134	Mausau-Rhinelande	WI	175,790	0.165	93,112	7,053	7	0	0
135	Rockford	IL	175,560	0.165	93,277	6,888	4	0	0

Source: DMA rankings, coverage data, Nielsen Media Research, 2002-2003. Number of current stations does not include CPs or low power stations

Comprehensive TV Market Summary

RANK	DMA	STATE	TVHH	% of US	Cum % US inc	Cum % US dec	Tot Stat	Sat Stat	sat VHF	sat UHF	Total w/o sat	w/o sat VHF	w/o sat UHF	Comm Stat	ED Stat	Comm VHF	Comm UHF	ED VHF	ED UHF
136	Duluth-Superior	MN	172,250	0.162	93.439	6.723	6	1	1	0	5	4	1	4	1	3	1	1	0
137	Beaumont-Port Arthur	TX	170,560	0.160	93.599	6.561	4	0	0	0	4	3	1	4	0	3	1	0	0
138	Topeka	KS	168,390	0.158	93.757	6.401	4	0	0	0	4	2	2	3	1	1	2	1	0
139	Columbia-Jefferson City	MO	164,200	0.154	93.911	6.243	5	0	0	0	5	3	2	4	1	2	2	1	0
140	Sioux City	IA	157,860	0.148	94.059	6.089	6	0	0	0	6	2	4	4	2	2	2	0	2
141	Medford-Klamath Falls	OR	157,500	0.148	94.207	5.941	9	2	1	1	7	4	3	5	2	3	2	1	1
142	Wichita Falls & Lawton	TX	157,410	0.148	94.355	5.793	4	0	0	0	4	3	1	4	0	3	1	0	0
143	Erie	PA	157,070	0.147	94.502	5.645	5	0	0	0	5	1	4	4	1	1	3	0	1
144	Wilmington	NC	155,350	0.146	94.648	5.498	4	0	0	0	4	2	2	3	1	2	1	0	1
145	Joplin-Pittsburg	MO	152,980	0.143	94.791	5.352	4	0	0	0	4	2	2	3	1	2	1	0	1
146	Terre Haute	IN	151,180	0.142	94.933	5.209	5	0	0	0	5	2	3	3	2	2	1	0	2
147	Lubbock	TX	149,990	0.141	95.074	5.067	8	1	0	1	7	3	4	6	1	2	4	1	0
148	Albany, GA	GA	149,180	0.140	95.214	4.926	6	0	0	0	6	1	5	4	2	1	3	2	0
149	Bluefield-Beckley-Oak Hill	WV	143,230	0.134	95.348	4.786	5	0	0	0	5	3	2	4	1	2	2	1	0
150	Wheeling-Steubenville	WV	141,790	0.133	95.481	4.652	3	0	0	0	3	2	1	2	1	2	0	0	1
151	Salisbury	MD	141,590	0.133	95.614	4.519	4	0	0	0	4	0	4	2	2	0	2	0	2
152	Rochestr-Mason City-Austin	MN	139,060	0.130	95.744	4.386	6	0	0	0	6	3	3	4	2	3	1	0	2
153	Bangor	ME	137,830	0.129	95.873	4.256	5	0	0	0	5	5	0	3	2	3	0	2	0
154	Binghamton	NY	136,670	0.128	96.001	4.127	4	0	0	0	4	1	3	3	1	1	2	0	1
155	Minot-Bismarck-Dickinson	ND	133,070	0.125	96.126	3.999	17	11	9	2	6	4	2	4	2	2	2	2	0
156	Anchorage	AK	132,740	0.124	96.250	3.874	9	2	2	0	7	6	1	6	1	5	1	1	0
157	Biloxi-Gulfport	MS	132,200	0.124	96.374	3.750	3	0	0	0	3	1	2	2	1	1	1	0	1
158	Odessa-Midland	TX	131,800	0.124	96.498	3.626	9	1	1	0	8	3	5	7	1	3	4	0	1
159	Panama City	FL	130,660	0.123	96.621	3.502	6	0	0	0	6	2	4	5	1	2	3	0	1
160	Sherman, TX-Ada, OK	TX	120,770	0.113	96.734	3.379	2	0	0	0	2	2	0	2	0	2	0	0	0
161	Palm Springs	CA	119,010	0.112	96.846	3.266	2	0	0	0	2	0	2	2	0	0	2	0	0
162	Gainesville	FL	116,380	0.109	96.955	3.154	4	0	0	0	4	1	3	3	1	0	3	1	0
163	Abilene-Sweetwater	TX	114,660	0.108	97.063	3.045	6	1	1	0	5	2	3	5	0	2	3	0	0
164	Quincy-Hannibal-Keokuk	MO	110,250	0.103	97.166	2.937	5	1	0	1	4	2	2	3	1	2	1	0	1
165	Idaho Falls-Pocatello	ID	108,400	0.102	97.268	2.834	6	1	1	0	5	4	1	4	1	3	1	1	0
166	Clarksburg-Weston	WV	105,640	0.099	97.367	2.732	4	0	0	0	4	2	2	3	1	1	2	1	0
167	Utica	NY	103,450	0.097	97.464	2.633	3	0	0	0	3	1	2	3	0	1	2	0	0
168	Hattiesburg-Laurel	MS	100,910	0.095	97.559	2.536	2	0	0	0	2	1	1	2	0	1	1	0	0
169	Missoula	MT	98,380	0.092	97.651	2.441	6	1	1	0	5	3	2	4	1	2	2	1	0
170	Billings	MT	98,150	0.092	97.743	2.349	5	1	1	0	4	4	0	4	0	4	0	0	0
171	Dothan	AL	97,520	0.091	97.834	2.257	3	0	0	0	3	1	2	3	0	1	2	0	0
172	Yuma-El Centro	AZ	96,400	0.090	97.924	2.166	5	0	0	0	5	4	1	5	0	4	1	0	0
173	Elmira	NY	95,760	0.090	98.014	2.076	3	0	0	0	3	0	3	3	0	0	3	0	0
174	Lake Charles	LA	92,680	0.087	98.101	1.986	3	0	0	0	3	1	2	2	1	1	1	0	1
175	Rapid City	SD	91,720	0.086	98.187	1.899	13	6	6	0	7	5	2	5	2	3	2	2	0
176	Watertown	NY	89,580	0.084	98.271	1.813	4	1	0	1	3	1	2	2	1	1	1	0	1
177	Marquette	MI	88,040	0.083	98.354	1.729	4	0	0	0	4	4	0	3	1	3	0	1	0
178	Harrisonburg	VA	86,320	0.081	98.435	1.646	3	0	0	0	3	1	2	1	2	1	0	0	2
179	Alexandria, LA	LA	85,540	0.080	98.515	1.565	4	0	0	0	4	1	3	3	1	1	2	0	1
180	Bowling Green	KY	81,790	0.077	98.592	1.485	4	0	0	0	4	1	3	2	2	1	1	0	2

Comprehensive TV Market Summary

RANK	DMA	STATE	TVHH	% of US	Cum % US inc	Cum % US dec	Tot Stat	Sat Stat	sat VHF	sat UHF	Total w/o sat	w/o sat VHF	w/o sat UHF	Comm Stat	ED Stat	Comm VHF	Comm UHF	ED VHF	ED UHF
181	Jonesboro	AR	81,580	0.076	98.668	1.408	3	0	0	0	3	1	2	2	1	1	1	0	1
182	Greenwood-Greenville	MS	79,750	0.075	98.743	1.332	3	0	0	0	3	1	2	2	1	1	1	0	1
183	Jackson, TN	TN	79,570	0.075	98.818	1.257	3	0	0	0	3	2	1	2	1	1	1	1	0
184	Grand Junction-Montrose	CO	72,010	0.068	98.886	1.182	7	2	2	0	5	4	1	4	1	4	0	0	1
185	Meridian	MS	70,670	0.066	98.952	1.114	4	0	0	0	4	1	3	3	1	1	2	0	1
186	Charlottesville	VA	67,490	0.063	99.015	1.048	2	0	0	0	2	0	2	1	1	0	1	0	1
187	Great Falls	MI	64,110	0.060	99.075	0.985	3	0	0	0	3	2	1	3	0	2	1	0	0
188	Parkersburg	WV	63,580	0.060	99.135	0.925	1	0	0	0	1	0	1	1	0	0	1	0	0
189	Lafayette, IN	IN	59,160	0.055	99.190	0.865	1	0	0	0	1	0	1	1	0	0	1	0	0
190	Eureka	CA	59,130	0.055	99.245	0.810	5	0	0	0	5	3	2	4	1	2	2	1	0
191	Twin Falls	ID	58,470	0.055	99.300	0.755	3	0	0	0	3	2	1	2	1	1	1	1	0
192	Laredo	TX	57,940	0.054	99.354	0.700	3	0	0	0	3	2	1	3	0	2	1	0	0
193	St. Joseph	MO	57,840	0.054	99.408	0.646	2	0	0	0	2	1	1	2	0	1	1	0	0
194	Lima	OH	57,560	0.054	99.462	0.592	3	0	0	0	3	2	1	3	0	2	1	0	0
195	Butte-Bozeman, MT	MT	56,400	0.053	99.515	0.538	5	1	1	0	4	3	1	3	1	2	1	1	0
196	San Angelo	TX	53,660	0.050	99.565	0.485	3	0	0	0	3	3	0	3	0	3	0	0	0
197	Cheyenne, WY-Scottsbluff,	WY	51,870	0.049	99.614	0.435	5	1	1	0	4	2	2	3	1	1	2	1	0
198	Ottumwa-Kirkville	IA	51,570	0.048	99.662	0.386	2	0	0	0	2	1	1	2	0	1	1	0	0
199	Mankato	MN	50,970	0.048	99.710	0.338	1	0	0	0	1	1	0	1	0	1	0	0	0
200	Casper-Riverton	WY	50,010	0.047	99.757	0.290	10	5	4	1	5	3	2	4	1	2	2	1	0
201	Bend, OR	OR	47,410	0.044	99.801	0.243	2	0	0	0	2	1	1	1	1	0	1	1	0
202	Zanesville	OH	32,280	0.030	99.831	0.199	1	0	0	0	1	0	1	1	0	0	1	0	0
203	Fairbanks	AK	31,860	0.030	99.861	0.169	5	0	0	0	5	5	0	4	1	4	0	1	0
204	Victoria	TX	30,400	0.028	99.889	0.139	2	0	0	0	2	0	2	2	0	0	2	0	0
205	Presque Isle	ME	29,300	0.027	99.916	0.111	2	0	0	0	2	2	0	1	1	1	0	1	0
206	Juneau, AK	AK	25,270	0.024	99.940	0.084	4	0	0	0	4	4	0	3	1	3	0	1	0
207	Helena	MT	24,380	0.023	99.963	0.060	2	0	0	0	2	2	0	2	0	2	0	0	0
208	Alpena	MI	17,960	0.017	99.980	0.037	2	0	0	0	2	2	0	1	1	1	0	1	0
209	North Platte	NE	15,670	0.015	99.995	0.020	3	0	0	0	3	3	0	2	1	2	0	1	0
210	Glendive	MT	4,960	0.005	100.000	0.005	1	0	0	0	1	1	0	1	0	1	0	0	0
Total			106,641,910	100.000			1697	182	96	86	1515	598	918	1216	299	489	727	111	188